

STATE OF GEORGIA
COUNTY OF RICHMOND

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AFFIDAVIT

Personally appeared before the undersigned attesting officer duly authorized to administer oaths, John Bell, who under oath deposes and says:

1. I am over 21 years of age and am competent to make this affidavit and am making this affidavit on my own personal knowledge unless otherwise indicated.

2. I am a graduate of the University of Georgia Law School. I have been practicing law since 1972. I have served as the Law Clerk to U. S. District Judge Wilbur D. Owens, Jr., 1972-1974. I was a Trustee of the Institute of Continuing Legal Education, Georgia for 1981-1982. I am a member and was on the Board of Directors of Trial Lawyers for Public Justice. I am a member of the Augusta and American Bar Associations; State Bar of Georgia (Chairman, General Practice and Trial Section, 1981-1982; Chairman, Georgia Institute of Trial Advocacy, 1983-1986). I am a member of and ~~was~~ an officer of Georgia Trial Lawyers Association (Life Member; Vice President, 1978-1984; Treasurer, 1984-1986; Secretary, 1987-1989); *President Elect 1996-1997* The Association of Trial Lawyers of America (Sustaining Member; Chairman, Environmental and Toxic Tort Section, 1989-1990; State Delegate, 1990-199**6**). I am currently a member of the Georgia Bar Foundation; Roscoe Pound American Trial Lawyers Foundation; Georgia Legal History Foundation (Trustee, 1988-1989). I am admitted to practice in South Carolina. My practice includes: Civil Litigation;

Personal Injury; Environmental and Toxic Tort Litigation;
Commercial Litigation; and Products Liability.

3. I have been involved in extensive trials and litigation; both within the State of Georgia and South Carolina. I have been lead counsel in several actions that have been certified as class actions.

4. I have known Mr. Stanley Jackson as a lawyer for over twenty years. He has an excellent reputation as a legal scholar and litigator. He and I have consulted on cases which I have litigated. He has shown exemplary capability. He is well respected in Class Action litigation.

5. Mr. Jackson is rated the highest rating by Martindale Hubbell of "AV" as a consequence of his litigation expertise. He concentrates his practice within the area of Complex Litigation and Class Actions.

6. I have personally testified in Martin et al. v. Phillips Colleges et al. as to his capabilities and expertise in a Class Action which was pending in the United States District Court for the Southern District of Georgia, Augusta Division. This action was certified as a Class Action and favorably concluded by Mr. Jackson for the members of the Class.

Sworn to and subscribed
before me this 3rd day
of September, 1996.

Marie T. Jenkins
NOTARY PUBLIC
My Commission Expires:

Notary Public, Richmond County Georgia
My Commission Expires November 29, 1999

John Bell

